

DRAFT

September 12, 1978

Mr. Robert Olcerst  
Industrial Toxicologist  
IBM  
Dept. 348 Bldg. 224  
P.O. Box 390  
Poughkeepsie, New York 12602

RECEIVED

SEP 14 1978

Emergency Response  
and Inspection Branch  
Edison, N. J.

Dear Mr. Olcerst:

This will respond to your letter to Richard Dewling dated July 28, 1978 concerning the development of an emergency plan of action for the handling of PCB containing materials.

Before addressing an emergency plan of action for spills and leaks, I would suggest that thorough consideration be given to spill prevention and countermeasure planning. Careful attention should be given to measures to prevent vandalism, as well as periodic testing and maintenance to anticipate and prevent hose or other equipment failure. Provision of an impermeable floor surrounded by an impermeable liquid containment wall can limit the area contaminated, and prevent flow into drains or directly into waterways. Attached, is a copy of our oil pollution prevention regulations which, beginning with paragraph 112.7, should be of assistance. Also attached is a copy of the American Petroleum Institute's Bulletin D16 for preparing a spill prevention, control and countermeasure plan.

With regard to an emergency plan of action, spill response teams and team leaders should be designated, with set communication, activation and response routines defined.

PCB's can be absorbed through the skin, so that oil resistant gloves, shoes, and outerware would be warranted, if in-house cleanup is anticipated.

Empty, sealable drums could be made readily available for temporary storage of contaminated material. Oil absorbent pads and an industrial liquid/solid vacuum cleaner could be utilized, although caution should be taken that the vacuum cleaner air exhaust would not emit PCB contaminated

328642



*Barber/Ind  
Neuro he should know this  
he should know this  
3/11 he should know  
he must notify  
can't do anything  
burning/  
leaking  
ballast*

*OK/yes 11/11  
permit*

*no breathing  
protection?*

*2nd page*

8/22  
Barham  
Please coordinate  
response with  
Solid Waste. Low  
PCB disposal reqs  
Sediment  
Thurs

July 28, 1978

Richard Dewling  
U.S. Environmental Protection Agency Region II  
26 Federal Plaza, New York

RECEIVED  
AUG 18 1978  
Forming System  
reference back to  
Dent (for info)  
kind of action for

U.S. EPA Division

Dear sir;

I have obtained your name from NYSDEC technical paper no 53 "Summary of Hudson River PCB Study Results." Perhaps you would be able to help or refer me to those who would be in a better position to help me. We at IBM are presently involved with setting up procedures for handling PCB containing materials such as transformers, ballasts and capacitors. We would like to have available to us an emergency plan of action to enable us to cope with spills or leaks of this type or material with the greatest speed and minimal exposure. Perhaps the most likely spill incident would involve the burning or leaking of a fluorescent ballast but we would also like to be prepared for leakages of 20 gallons from large transformers. Information on how to contain, collect, store and dispose of such spills is what is sought. I hope to hear from you soon and will be glad to answer any specific questions that you might have on our operation.

Sincerely,

Robert Olcerst  
Industrial Toxicologist  
IBM  
Dept. 348 Bldg 224  
P.O. Box 390  
Poughkeepsie, New York 12602

RECEIVED

AUG 18 1978

Emergency Action  
and Inspection Branch  
Edison, N. J.